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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

JUAN PAUL FLORES,)	
)	
Plaintiff,)	
)	
vs.)	Civil Case No. 14-CV-184-S
)	
GEORGE MENIG,)	
)	
Defendant.)	

**STIPULATED MOTION TO VACATE PRETRIAL, TRIAL AND CASE
DEADLINES AND REQUEST A NEW SCHEDULING CONFERENCE**

The parties hereto, by and through their respective undersigned counsel of record, hereby jointly stipulate and move the Court for an Order vacating the trial, pretrial and all case deadlines, for the reasons stated herein.

Plaintiff initially served a *Subpoena Duces Tecum* on The City of Cody and The Cody Police Department on February 17, 2015, for documents, internal records, materials and relevant evidence relating to the arrest of the Plaintiff in September 2010. Plaintiff's counsel had several discussions with counsel for The City of Cody and The Cody Police Department regarding those requested documents, internal records, materials and relevant evidence, and in March, served an *Amended Subpoena Duces Tecum* on The City of Cody and The Cody Police Department. Counsel for the Plaintiff agreed that the time frame within which to respond to the amended subpoena could be extended to allow The City of Cody and The Cody Police Department ample time to gather all such requested materials. Counsel for Plaintiff received those materials on June 8, 2015. That left 14 business days for any expert to review the materials.

Additionally, the materials provided via the aforementioned subpoena were, for the most part, unreadable. Fourteen (14) CD's were produced and one (1) flash drive. Most of the CD's are either "un-openable" or "unreadable". Plaintiff's counsel is still waiting to receive The City of Cody and The Cody Police Department Privilege Log of what was not produced in their response to the subpoena. Defense counsel has not even been afforded the opportunity to review any of the materials produced.

Further, counsels' trial calendars for the remainder of the summer and fall are now full.

WHEREFORE, the parties jointly request that the Court for an Order vacating the trial, the pretrial and all case deadlines in this matter, for the reasons stated above, and respectfully request a new Scheduling Conference with the Court.

RESPECTFULLY SUBMITTED this 25th day of June 2015.

By: _____/SS/_____
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